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# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	)	CRIMINAL NO. TYPE 24CVII
v.	)	
	)	(Money Laundering, 18 U.S.C. §
HASSAN TUCKER	)	1956(a)(3)(B) and (C); Failure to File
	)	Form 8300, 31 U.S.C. § 5324(b)(1) and
Defendant.	)	(d); Forfeiture, 18 U.S.C. § 982, 21
	)	U.S.C. § 853(p), 28 U.S.C. § 2461, 31
	ĺ	U.S.C. 8 5317)

#### **INDICTMENT**

### <u>COUNT I</u> (Money Laundering)

The Grand Jury for the District of Maryland charges that:

On or about January 27, 2023, in the District of Maryland, the defendant,

#### HASSAN TUCKER

with the intent to conceal and disguise the nature, location, source, ownership and control, of property believed to be the proceeds of specified unlawful activity, and with the intent to avoid transaction reporting requirements, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or foreign commerce involving property represented by a law enforcement officer, to be proceeds of specified unlawful activity, property used to conduct or facilitate specified unlawful activity, to wit: he sold an undercover law enforcement officer posing as a drug dealer an Acura SUV in exchange for \$27,000 in U.S. Currency, which he understood was the proceeds of cocaine trafficking, and titled the vehicle in what he believed to be the name of a female associate of the undercover law enforcement officer posing as a drug dealer.

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18 U.S.C. §§ 1956(a)(3)(B) and 2.

# <u>COUNT II</u> (Failure to File Form 8300)

The Grand Jury for the District of Maryland further charges that:

On or about January 27, 2023, in the District of Maryland, the defendant,

#### HASSAN TUCKER

knowingly and for the purpose of evading the reporting requirements of section 5331 of Title 31, United States Code, and the regulations promulgated thereunder, did cause and attempt to cause a nonfinancial trade or business to fail to file a report required under section 5331 of Title 31, and any regulation prescribed under any such section, and did so while violating another law of the United States, to wit: defendant caused H&H Motors II to fail to file a currency transaction report, Form 8300, while violating Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

31 U.S.C. §§ 5324(b)(1) and 5324(d)

31 C.F.R. § 1010.330.

## **FORFEITURE ALLEGATIONS**

The Grand Jury for the District of Maryland further alleges that:

1. Upon conviction of an offense set forth in Count One of this Indictment, the defendant,

#### HASSAN TUCKER

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.

2. Upon conviction of an offense set forth in Count Two of this Indictment, the defendant,

#### HASSAN TUCKER

shall forfeit to the United States of America, pursuant to Title 31, United States Code, Section 5317, any property, real or personal, involved in such offense, and any property traceable to such property.

### Substitute Assets

- 3. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or,
  - e. has been commingled with other property which cannot be divided without difficulty,

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the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

18 U.S.C. § 982(a)(1) 21 U.S.C. § 853 28 U.S.C. § 2461(c) 31 U.S.C. § 5317 Fed. R. Crim. P. 32.2(a)

For: Erek L. Barron

United States Attorney

4/9/2024

A TRUTE BILL:

SIGNATURE REDACTED

EOREPERSON

Date